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UNITED STATES BANKRUPTCY COURT
District of New Jersey

In re: :
 : Chapter 13 Case No. 17-10881
Gary & Leigh Ann Hulse :
 : Judge: Hon. Michael B. Kaplan, U.S.B.J.
Debtors :

MOTION TO APPROVE LOAN MODIFICATION

To: Albert Russo, Esq., Chapter 13 Trustee
CN 4853
Trenton, New Jersey 08650

ALL PARTIES ON ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that the undersigned attorneys for the Debtors in the within bankruptcy proceeding hereby move before the Honorable Michael B. Kaplan, U.S.B.J., United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey for an order approving a loan modification agreement between the Debtors and Seterus.

The undersigned shall rely upon the Certification of Gary Hulse and the oral arguments of counsel, if necessary.

PLEASE TAKE FURTHER NOTICE that the Debtors submit herewith no brief or memorandum of law in connection with this motion, there being no disputed questions of law involved. If a disputed question of law should arise on the return date of the motion, the movant further reserves the right to file a brief or memorandum of law in accordance with any time table set by the Court.

PLEASE TAKE FURTHER NOTICE that in accordance with General Orders governing the practice before the United States Bankruptcy Court for the District of New Jersey, unless an objection to the loan modification is served and filed with the Court, an order may be entered approving the proposed loan modification, which will be effective as of the date on which the motion was filed. If a timely objection is filed, the Court will schedule a hearing at the earliest opportunity.

COLLINS, VELLA & CASELLO, LLC
Attorneys for Debtors

Dated: 9/21/2017

By: /s/ Joseph M. Casello
Joseph M. Casello, Esq.

Service List

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